

Mr. Robert South
Inland Southern Corporation
706 West 18th Street
Connersville, IN 47331

Re: 041-15017
First Administrative Amendment to
FESOP 041-11749-00017

Dear Mr. South:

Inland Southern Corporation was issued a permit on June 19, 2000, for the operation of a stationary metal building components facility. A letter requesting an administrative amendment was received on October 3, 2001, to add welding equipment to the facility. According to 326 IAC 2-8-10(a)(14), an administrative amendment may be used for a "modification that adds an emission unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3". The potential-to-emit of the modification is 3.72 tons per year of PM-10, which is below the significant thresholds in 326 IAC 2-2 and 326 IAC 2-3. Therefore, the permit is hereby administratively amended as follows (**bold** to show additions):

(1) The facility description in Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) spray booth, known as SB-1, installed in 1996, equipped with dry filters for particulate overspray control, exhausted through stack SB-1, capacity: 2.5 metal building components per hour.
- (b) One (1) submerged arc welder, known as SAW1, installed in 1996, capacity: 5,000pounds of steel per hour.
- (c) Six (6) meal inert gas welders, known as MIG1 - MIG6, installed in 1996, capacity: 833 pounds of steel per hour, each.
- (d) Two (2) oxyacetylene flame cutters, known as OFC1 and OFC2, installed in 1996, capacity: 1.0 pounds of steel per hour, each.
- (e) Two (2) plasma flame cutters, known as PFC1 and PFC2, installed in 1997, capacity: 1.0 pounds of steel per hour, each.
- (f) **One (1) submerged arc welder, installed in 2001, capacity: 5000 pounds of steel per hour.**

- (2) The facility description in Section D.2 is amended as follows:

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Welding

- (b) One (1) submerged arc welder, known as SAW1, installed in 1996, capacity: 5,000 pounds of steel per hour.
- (c) Six (6) meal inert gas welders, known as MIG1 - MIG6, installed in 1996, capacity: 833 pounds of steel per hour, each.
- (d) Two (2) oxyacetylene flame cutters, known as OFC1 and OFC2, installed in 1996, capacity: 1.0 pounds of steel per hour, each.
- (e) Two (2) plasma flame cutters, known as PFC1 and PFC2, installed in 1997, capacity: 1.0 pounds of steel per hour, each.
- (f) **One (1) submerged arc welder, installed in 2001, capacity: 5,000 pounds of steel per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (3) The allowable PM emission rate from the new welder is added to Section D.2.1:

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

- (1) The particulate matter (PM) from SAW1 shall be limited to 7.58 pounds per hour for a process weight rate of 5,000 pounds of metal per hour.
- (2) The particulate matter (PM) from MIG1 - MIG6 shall be limited to 2.28 pounds per hour, each, for a process weight rate of 833 pounds of metal per hour, each.
- (3) **The particulate matter (PM) from the submerged arc welder (installed in 2001) shall be limited to 7.58 pounds per hour for a process weight rate of**

5,000 pounds of metal per hour.

- (b) When operating at a process weight rate of less than 100 pounds per hour the allowable PM emission rate shall not exceed 0.551 pounds per hour. Therefore the (PM) from

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OFC1, OFC2, PFC1 and PFC2 shall not exceed 0.551 pounds per hour, each.

- (4) Additionally, references to the Office of Air Management (OAM) have been changed to the Office of Air Quality (OAQ), and the company name has been corrected from 'Inland Southern Company' to 'Inland Southern Corporation'.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Fayette County
U.S. EPA, Region V
Fayette County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Inland Southern Corporation
706 West 18th Street
Connersville, Indiana, 47331**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 041-11749-00017	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 19, 2000

First Administrative Amendment No.: 041-15017	Pages Modified: 5, 28
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal building components source.

Authorized Individual: Robert South
Source Address: 706 West 18th Street, Connersville, Indiana, 47331
Mailing Address: 706 West 18th Street, Connersville, Indiana, 47331
Phone Number: 765-825-2671
SIC Code: 3448
County Location: Fayette
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) spray booth, known as SB-1, installed in 1996, equipped with dry filters for particulate overspray control, exhausted through stack SB-1, capacity: 2.5 metal building components per hour.
- (b) One (1) submerged arc welder, known as SAW1, installed in 1996, capacity: 5,000 pounds of steel per hour.
- (c) Six (6) meal inert gas welders, known as MIG1 - MIG6, installed in 1996, capacity: 833 pounds of steel per hour, each.
- (d) Two (2) oxyacetylene flame cutters, known as OFC1 and OFC2, installed in 1996, capacity: 1.0 pounds of steel per hour, each.
- (e) Two (2) plasma flame cutters, known as PFC1 and PFC2, installed in 1997, capacity: 1.0 pounds of steel per hour, each.
- (f) One (1) submerged arc welder, installed in 2001, capacity: 5,000 pounds of steel per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than

500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

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Permit Reviewer: PMM/MES

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Modified by: Madhurima D. Moulik

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SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Welding

- (b) One (1) submerged arc welder, known as SAW1, installed in 1996, capacity: 5,000 pounds of steel per hour.
- (c) Six (6) meal inert gas welders, known as MIG1 - MIG6, installed in 1996, capacity: 833 pounds of steel per hour, each.
- (d) Two (2) oxyacetylene flame cutters, known as OFC1 and OFC2, installed in 1996, capacity: 1.0 pounds of steel per hour, each.
- (e) Two (2) plasma flame cutters, known as PFC1 and PFC2, installed in 1997, capacity: 1.0 pounds of steel per hour, each.
- (f) One (1) submerged arc welder, installed in 2001, capacity: 5,000 pounds of steel per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

- (1) The particulate matter (PM) from SAW1 shall be limited to 7.58 pounds per hour for a process weight rate of 5,000 pounds of metal per hour.
- (2) The particulate matter (PM) from MIG1 - MIG6 shall be limited to 2.28 pounds per hour, each, for a process weight rate of 833 pounds of metal per hour, each.
- (3) The particulate matter (PM) from the submerged arc welder (installed in 2001) shall be limited to 7.58 pounds per hour for a process weight rate of 5,000 pounds of metal per hour.
- (b) When operating at a process weight rate of less than 100 pounds per hour the allowable PM emission rate shall not exceed 0.551 pounds per hour. Therefore the (PM) from OFC1, OFC2, PFC1 and PFC2 shall not exceed 0.551 pounds per hour, each.

Compliance Determination Requirement [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

D.2.2 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is

required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Appendix A: Emissions Calculations
Welding

Page 1 of 1 TSD App A

Company Name: Inland Southern Corporation
Address City IN Zip: 706 West 18th Street
CP: 041-15017
Plt ID: 041-00017
Reviewer: Madhurima D. Moulik
Date: October 16, 2001

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	1	23.62		0.036	0.011			0.850	0.260	0.000	0	0.260
EMISSION TOTALS												
Potential Emissions lbs/hr								0.85				0.26
Potential Emissions lbs/day								20.41				6.24
Potential Emissions tons/year								3.72				1.14

METHODOLOGY

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.